

EXHIBIT 20

From: [Hawkins, Ryan B. \(SDO\)](#)
To: [Ryan Caughey](#); [Edlin, Elise \(SFO\)](#); [Nolan, Doug \(PAO\)](#); [Amber Magee](#); [Bryce T. Barcelo](#); [Max Tribble](#); [Vanesa Keller](#); [Kalpana Srinivasan](#); [Stacy Schulze](#)
Cc: [*Cisco-Paltalk](#)
Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics
Date: Tuesday, September 27, 2022 3:30:00 PM

Ryan,

At your request, the parties met and conferred in August to discuss the topic of case narrowing. You requested that Cisco agree to narrow its prior art invalidity case to a number of unique combinations/theories if Paltalk agreed to narrow the amount of claims it was asserting from the 10 currently being asserted. The parties agreed that Paltalk would need to specify what claims it was dropping before Cisco could effectively narrow its invalidity case. You further agreed that this narrowing would need to occur prior to the exchange of opening expert reports in order to save the parties from unnecessarily work addressing claims that Paltalk would be dropping as part of this agreement. We agreed to your proposal as noted in your email below. However, we are two days away from opening expert reports and Paltalk has not yet dropped any claims from its contentions. Despite this, Cisco intends to follow through on its agreement to your proposal and will be narrowing its invalidity case.

Ryan Hawkins | Perkins Coie LLP

SENIOR COUNSEL

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E. RHawkins@perkinscoie.com

From: Ryan Caughey <rcaughey@susmangodfrey.com>

Sent: Wednesday, September 7, 2022 3:00 PM

To: Edlin, Elise (SFO) <EEEdlin@perkinscoie.com>; Nolan, Doug (PAO) <DNolan@perkinscoie.com>; Amber Magee <AMagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller <VKeller@susmangodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Stacy Schulze <ssschulze@SusmanGodfrey.com>

Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

Elise et al – Thank you for getting on the call on Friday about the 30b6 notice and depo logistics, etc. Here's where we are:

30(b)(6) Topics/Depos of Cisco

- We discussed at length the 30(b)(6) topics we served on Cisco. We discussed your objections, and I agreed to clarify certain of the topics for which you refused to provide a witness. While we don't agree with your objections, our goal is to resolve any disputes so we can proceed promptly with depositions and complete discovery. Additionally, as noted in the attached, you indicated that you would be providing a witness for at least some of those topics. Please see

attached for our clarifications to certain topics. Please confirm that, with the clarified topic, you will be presenting a witness on the topics identified in the attached document.

- Additionally, you told us that the witnesses you had already identified would be testifying on various 30(b)(6) topics. You have now identified the topics for Friday's deposition. With respect to future depositions, we ask that you identify topics ASAP. Your failure to tell us which topics will be covered at upcoming depositions is prejudicing our ability to prepare for them.

Deposition Scheduling

- Mr. Katz is confirmed for his remote depo on 9/14 and 9/15. Per our discussion, I propose proceeding with Mr. Katz's 30(b)(6) deposition, and if there are questions outside the scope, we can make a scope objection for the record but will allow Mr. Katz to testify in his personal capacity, subject of course to privilege objections and other appropriate objections.
- You confirmed that Mr. Hamilton could proceed on 9/22 and Mr. Buckles on 9/23. Let's calendar those.
- We could take 5 Corners on 9/26 or 9/27 if that helps with the schedule.
- We understand that Messrs. Belcher and/or Buckles will cover the source code issues and the majority of the tech at issue, accused functionalities, etc. We also asked that we calendar depositions for Messrs. Zhang and Wang, who are the source code owners. Those depositions can be scheduled for after Messrs. Belcher and Buckles and the understanding is they may not need to proceed.

Other Issues / Documents

- When we met and conferred about narrowing of claim terms and invalidity references, I proposed an approach where Cisco would narrow its references to a number of unique combinations/theories to an amount commensurate with the number of claims asserted, and Paltalk would consider a modest narrowing of the 10 claims asserted. It's now our understanding that you agree with that approach, but you've asked us to identify proposed claims to drop before you narrow your references. We're considering that request and will get back to you shortly on it.
- We raised the issue that a large volume of presentations, memos, etc. were included with the source code but not produced in the ordinary course of discovery. On our call, you acknowledged that this was the case and said you were working on producing these materials as soon as possible. It's my understanding that those materials were produced yesterday. Please confirm they've now been produced in full.

Further, we received a large production of documents last night. We are trying to review them quickly, but the late production prejudices our ability to prepare for Friday's deposition. At this point, we anticipate proceeding with Friday's deposition, but we will let you know if we encounter insurmountable issues.

Please let us know your response as soon as possible or tell us times early next week when you're available to meet and confer. Thanks.

Ryan

Ryan Caughey | Susman Godfrey LLP

713.653.7823 | c. 202.714.2302

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From: Ryan Caughey

Sent: Friday, September 2, 2022 10:52 AM

To: Edlin, Elise (SFO) <EEEdlin@perkinscoie.com>; Nolan, Doug (PAO) <DNolan@perkinscoie.com>; Amber Magee <amagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller <vkeller@susmangodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Stacy Schulze <SSSCHULZE@SusmanGodfrey.com>

Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

Great. We both sent invites. I'm happy to use yours, but I don't care either way.

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From: Edlin, Elise (SFO) <EEEdlin@perkinscoie.com>

Sent: Friday, September 2, 2022 10:49 AM

To: Ryan Caughey <rcaughey@susmangodfrey.com>; Nolan, Doug (PAO) <DNolan@perkinscoie.com>; Amber Magee <AMagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller <VKeller@susmangodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Stacy Schulze <SSSCHULZE@SusmanGodfrey.com>

Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

EXTERNAL Email

Ryan,

10:30 is fine.

Thank you,

Elise Edlin | Perkins Coie LLP

COUNSEL

She/her/hers

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Visit our COVID-19 page: www.perkinscoie.com/coronavirus

Read our Commitment to Racial Equality: www.perkinscoie.com/racialequality

From: Ryan Caughey <rcaughey@susmangodfrey.com>

Sent: Friday, September 2, 2022 6:34 AM

To: Edlin, Elise (SFO) <EEdlin@perkinscoie.com>; Nolan, Doug (PAO) <DNolan@perkinscoie.com>;
Amber Magee <AMagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>;
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Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Stacy Schulze
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Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6)
Depo. Notice re Depo. Topics

Elise – A conflict has come up and I can no longer talk at 10am PDT. Could you do 10:30?

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From: Ryan Caughey

Sent: Thursday, September 1, 2022 1:31 PM

To: Edlin, Elise (SFO) <EEdlin@perkinscoie.com>; Nolan, Doug (PAO) <DNolan@perkinscoie.com>;
Amber Magee <amagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>;
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Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Stacy Schulze
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Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6)
Depo. Notice re Depo. Topics

Yes, I can talk at 10am PDT tomorrow. I'll send an invite.

We can take Pearce on 9/9 and will take him remotely. We can also take Belcher on the 21st, also likely remotely. We'll send notices.

For the other two, I do not understand why you proposed dates after the close of fact discovery. Please propose dates within the discovery period. Please also propose date(s) for the 30(b)(6) deposition. We want to take the witnesses proposed as 30(b)(1) depositions, and we are also of course entitled to a 30(b)(6) deposition. If those witnesses will also be 30(b)(6) deponents, we reserve the right to seek more than one day of testimony. Additionally, we need to know immediately if Mr. Pearce will testify on any 30(b)(6) topics.

With respect to Mr. Katz, we are okay proceeding with his 30(b)(6), followed by 30(b)(1) testimony as needed. We will be sending our 30(b)(6) objections by the end of this week. One additional note on Mr. Katz: there is a chance we will have a conflict on 9/14 and 9/15; we are hoping we will not but won't know for sure until tomorrow. OWould you be available to take his deposition on 9/20 and, as needed, 9/21 instead if it becomes necessary?

We can discuss these issues tomorrow.

Best,
Ryan

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From: Edlin, Elise (SFO) <EEEdlin@perkinscoie.com>

Sent: Thursday, September 1, 2022 1:01 PM

To: Ryan Caughey <rcaughey@susmangodfrey.com>; Nolan, Doug (PAO) <DNolan@perkinscoie.com>; Amber Magee <AMagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller <VKeller@susmangodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Stacy Schulze <ssSCHULZE@SusmanGodfrey.com>

Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

EXTERNAL Email

Hi Ryan,

I'm available tomorrow morning at 10 am PDT. Please let me know if that works, otherwise we can discuss on Tuesday.

Are you able to confirm any of the dates that we provided already (especially Pearce next Friday)? Once those are solidified it will be easier to schedule anything additional that is needed, and if those need to reshuffle then the sooner the better in order to find additional availability during the month of September.

Thank you,

Elise Edlin | Perkins Coie LLP
COUNSEL
She/her/hers

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Visit our COVID-19 page: www.perkinscoie.com/coronavirus

Read our Commitment to Racial Equality: www.perkinscoie.com/racialequality

From: Ryan Caughey <rcaughey@susmangodfrey.com>

Sent: Thursday, September 1, 2022 7:26 AM

To: Nolan, Doug (PAO) <DNolan@perkinscoie.com>; Amber Magee <AMagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller <VKeller@susmangodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Stacy Schulze <SSCHULZE@SusmanGodfrey.com>

Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

Counsel – Please let us know when you are available to meet and confer about these objections. We could chat tomorrow or early next week. Please also let us know dates when your 30(b)(6) witnesses are available to be presented. Thanks

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From: Nolan, Doug (PAO) <DNolan@perkinscoie.com>

Sent: Monday, August 29, 2022 4:36 PM

To: Amber Magee <AMagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Ryan Caughey

<rcaughey@susmangodfrey.com>; Vanesa Keller <VKeller@susmangodfrey.com>

Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

EXTERNAL Email

Counsel,

Please find attached for service the following document sent in connection with the above-referenced matter:

- CISCO SYSTEM, INC.'S RESPONSES AND OBJECTIONS TO PALTALK HOLDINGS, INC.'S NOTICE OF RULE 30(B)6 DEPOSITION OF CISCO SYSTEMS, INC.: DEPOSITION TOPICS

Best regards,

Doug Nolan | Perkins Coie LLP

SENIOR PARALEGAL

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